

Robert Nichols
Therma Tru Corporation
108 Mutzfield Road
Butler, Indiana 46721

Re: **033-12746**
First Administrative Amendment to
Part 70 033-7927-00019

Dear Mr. Nichols:

Therma Tru Corporation was issued a permit on November 12, 1999 for a stationary metal doors, sash and trim plastics products manufacturing plant. A letter requesting to replace the flowcoater at their existing plant was received on August 17, 2000. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal doors, sash and trim plastics products manufacturing plant

Responsible Official: **Robert Nichols** ~~Brett Mueller~~

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) Fiberglass operations, identified as EU1, consisting of one (1) resin mixer, one (1) fiberglass extruder (SMC) and six (6) fiberglass presses, with a maximum capacity of 17,280 pounds of resin per hour, and exhausting to stacks 13.1, 13.2 13.3 and 13.4
- (2) One door skin gluing operation, identified as EU2, with a maximum capacity of 360 doors per hour, and exhausting to stacks 1.1 and 1.2.

- (3) One (1) flowcoating operation, identified as EU3, consisting of one (1) flowcoater, **equipped with filters, replaced in 2000**, one (1) flash off tunnel and one (1) paint cure oven, with a maximum capacity of 360 doors per hour, and exhausting to stacks 3.1 and 3.2, 4.1 and 4.2, and 4.3 and 4.4 respectively.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) Fiberglass operations, identified as EU1, consisting of one (1) resin mixer, one (1) fiberglass extruder (SMC) and six (6) fiberglass presses, with a maximum capacity of 17,280 pounds of resin per hour, and exhausting to stacks 13.1, 13.2 13.3 and 13.4
- (2) One door skin gluing operation, identified as EU2, with a maximum capacity of 360 doors per hour, and exhausting to stacks 1.1 and 1.2.
- (3) One (1) flowcoating operation, identified as EU3, consisting of **one (1) three (3) flowcoaters, equipped with filters**, one (1) flash off tunnel and **one (1) four (4) paint cure ovens**, with a maximum capacity of 360 doors per hour, and exhausting to stacks 3.1, 3.2, 4.1, 4.2, 4.3 and 4.4.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-2]

The flowcoater (EU3) shall use less than 74.8 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 74.8 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.32 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of coating delivered to the applicator at the flowcoating operation (EU3) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.4 PM and PM₁₀ [326 IAC 2-2]

The PM and PM₁₀ emissions from the flowcoater (EU3) shall not exceed 1.19 pounds per hour. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.53 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the fiberglass operation shall not exceed 17.38 pounds per hour when operating at a process weight rate of 17280 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2(c)(Particulate Emission Limitations), the particulate matter (PM) overspray from the door skin gluing operation (EU2) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.64 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the flowcoating operation and any control devices.

Compliance Determination Requirements

~~D.1.5 Testing Requirements [326 IAC 2-7-6(1)]~~

~~The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1(a) shall be determined by a performance test conducted in accordance with Section C - Performance Testing.~~

D.1.76 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.87 VOC Emissions

Compliance with Conditions D.1.1(a) and D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent 12 month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Particulate Matter (PM)

The filters for PM control shall be in operation at all times when the flowcoater (EU3) is in operation.

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (3.1 and 3.2) while the flowcoater is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.118 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 3.5 pounds per gallon, less water, is used, by:

$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [Dc * O * Q / [1-W * Dc / Dw]]}{3 C}$$

Dc = density of coating, lb/gal
Dw = density of water, lb/gal
O = weight percent organics, %
Q = quantity of coating, gal/unit
W = percent volume water, %
C = total of coatings used, gal/unit

- (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.**
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
 - (2) A log of the dates of use;**
 - (3) The cleanup solvent usage for each month;**
 - (4) The total VOC usage for each month; and**
 - (5) The weight of VOCs emitted for each compliance period.**
- (c) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.**
- (db)** All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.129 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a) and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
AIR COMPLIANCE BRANCH**

Part 70 Quarterly Report

Source Name: Therma Tru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Part 70 Permit No.: T033-7927-00019
Facility: Flowcoater (EU3)
Parameter: VOC delivered to the flowcoater
Limit: Less than 74.8 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is not required for this report

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mark L. Kramer, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
MLK/MES

cc: File - Dekalb County
U.S. EPA, Region V
Dekalb County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT and ENHANCED NEW SOURCE REVIEW OFFICE OF AIR MANAGEMENT

**Therma Tru Corporation
108 Mutzfeld Road
Butler, Indiana 46721**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 033-7927-00019	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: November 12, 1999

First Significant Source Modification, SSM 033-10998-00019, issued January 21, 2000
First Significant Permit Modification, SPM 033-11605-00019, issued January 28, 2000
Second Significant Permit Modification SPM 033-11940-00019, issued June 2, 2000
Second Significant Source Modification SSM 033-12630-00019, issued

First Administrative Amendment: AAT 033-12746-00019	Pages Affected: 5, 5a, 5b, 30 - 32a, and 43a
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary metal doors, sash and trim plastics products manufacturing plant

Responsible Official: Robert Nichols
Source Address: 108 Mutzfeld Road, Butler, IN 46721
Mailing Address: 108 Mutzfeld Road, Butler, IN 46721
SIC Code: 3442 and 3089
County Location: Dekalb
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) Fiberglass operations, identified as EU1, consisting of one (1) resin mixer, one (1) fiberglass extruder (SMC) and six (6) fiberglass presses, with a maximum capacity of 17,280 pounds of resin per hour, and exhausting to stacks 13.1, 13.2 13.3 and 13.4
- (2) One door skin gluing operation, identified as EU2, with a maximum capacity of 360 doors per hour, and exhausting to stacks 1.1 and 1.2.
- (3) One (1) flowcoating operation, identified as EU3, consisting of one (1) flowcoater, equipped with filters, replaced in 2000, one (1) flash off tunnel and one (1) paint cure oven, with a maximum capacity of 360 doors per hour, and exhausting to stacks 3.1and 3.2, 4.1and 4.2, and 4.3 and 4.4 respectively.
- (4) One (1) machining station, identified as EU4, with a maximum capacity of 360 doors per hour, using a dust collector for particulate emission control, and exhausting to stack 5.1.
- (5) One (1) calcium carbonate storage silo, identified as EU5, with a maximum throughput of 16,500 pounds per day, and using a baghouse for particulate control.
- (6) Degreasing operations, identified as EU6, consisting of one (1) Safety Kleen cold cleaner and one (1) methylene chloride cold cleaner, exhausting to stacks 13.1, 13.2, 13.3 and 13.4.

Door Assembly Line, capacity: 20,250 pounds of doors per hour or 450 doors per hour

- (7) One (1) electric door skin preheat oven, known as D2-OV1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.1, capacity: 20,250 pounds per hour of fiberglass door skins per hour or 450 doors per hour.
- (8) One (1) adhesive application station, known as D2-APP1, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, capacity, 43 pounds of adhesive per hour or 450 doors per hour.
- (9) One (1) electric glue curing oven, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.2, known as D2-OV2, capacity: 450 doors per hour.
- (10) One (1) electric skin reheat oven, known as D2-OV3, exhausting through Stack 6.8 and/or Stack 7.2 and/or Stack 18.3, capacity: 450 doors per hour.
- (11) One (1) door foam injection system, known as D2-F1, exhausting through Stack 19.1, capacity: 2,300 pounds of resin and foam insulation per hour or 450 doors per hour.
- (12) One (1) door machining station, known as D2-MS1, equipped with a baghouse and cyclone connected in series, known as D2-DC1, exhausting through Stack 20.1, capacity: 450 doors per hour or 20,250 pounds per hour.

New Skins Warehouse

Molding Plant Sheet Molding Compound Production Line, known as SMC2, capacity: 18,500 pounds of molding compound per hour, consisting of:

- (13) One (1) existing permitted calcium carbonate silo to be relocated, equipped with a baghouse, known as SILO1, exhausting through Stacks 25.1, capacity: 150,000 pounds calcium carbonate.
- (14) Two (2) calcium carbonate silos, known as SILO2 and SILO3, each equipped with a baghouse, exhausting through Stacks 25.2 and 25.3, throughput: 2,960 pounds of calcium carbonate per hour each, capacity: 200,000 pounds calcium carbonate, each.
- (15) Two (2) resin mixers, exhausting through Stack 17.1 and/or Stack 17.2, throughput: 8,880 pounds of calcium carbonate, 4,700 pounds of resin, 648 pounds of pigment mixture, 130 pounds of release agent, and 74 pounds of catalyst per hour.
- (16) One (1) sheet molding compound extruder, exhausting through Stack 17.1 and/or Stack 17.2, throughput 14,432 pounds of materials plus 4,070 pounds of chopped fiberglass strands per hour.
- (17) Four (4) sheet molding compound presses, throughput 18,500 pounds of sheet molding compound per hour.
- (18) One (1) hose cleaning re-circulation station, (cold cleaner tank, known as SMC-CC2), exhausting through Stack 17.1 and/or Stack 17.2, capacity: 0.957 pounds of methylene chloride per hour (based on 20 hours per day at 1.75 gallons per day).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) Fiberglass operations, identified as EU1, consisting of one (1) resin mixer, one (1) fiberglass extruder (SMC) and six (6) fiberglass presses, with a maximum capacity of 17,280 pounds of resin per hour, and exhausting to stacks 13.1, 13.2 13.3 and 13.4
- (2) One door skin gluing operation, identified as EU2, with a maximum capacity of 360 doors per hour, and exhausting to stacks 1.1 and 1.2.
- (3) One (1) flowcoating operation, identified as EU3, consisting of one (1) flowcoater, equipped with filters, replaced in 2000, one (1) flash off tunnel and one (1) paint cure oven, with a maximum capacity of 360 doors per hour, and exhausting to stacks 3.1and 3.2, 4.1and 4.2, and 4.3 and 4.4 respectively.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) The total potential to emit VOCs from the fiberglass operation (EU1) shall be limited to 24 tons per year, based on a monthly rolling average. Therefore, pursuant to 326 IAC 8-1-6 (BACT), this facility will not be subject to this rule.
- (b) Any change or modification which may increase the actual emissions of VOC to 25 tons or more per year from the fiberglass operations (EU1) must be approved by the Office of Air Management before such change may occur.
- (c) Any change or modification which may increase the potential emissions of VOC to 25 tons or more per year from the door skin gluing operations (EU2) must be approved by the Office of Air Management before such change may occur.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 2-2]

The flowcoater (EU3) shall use less than 74.8 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 74.8 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating), the volatile organic compound (VOC) content of coating delivered to the applicator at the flowcoating operation (EU3) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air dried coatings.
- (b) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.4 PM and PM₁₀ [326 IAC 2-2]

The PM and PM₁₀ emissions from the flowcoater (EU3) shall not exceed 1.19 pounds per hour. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2(c)]

- (a) Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the fiberglass operation shall not exceed 17.38 pounds per hour when operating at a process weight rate of 17280 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2(c)(Particulate Emission Limitations), the particulate matter (PM) overspray from the door skin gluing operation (EU2) shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the flowcoating operation and any control devices.

Compliance Determination Requirements

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Conditions D.1.1(a) and D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent 12 month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Particulate Matter (PM)

The filters for PM control shall be in operation at all times when the flowcoater (EU3) is in operation.

D.1.10 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (3.1 and 3.2) while the flowcoater is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered

a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.11 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 3.5 pounds per gallon, less water, is used, by:
$$\frac{\text{lb VOC}}{\text{gallon less water}} = \frac{3 \text{ coatings } [Dc * O * Q / [1-W * Dc / Dw]]}{3 C}$$

Dc = density of coating, lb/gal	Dw = density of water, lb/gal
O = weight percent organics, %	Q = quantity of coating, gal/unit
W = percent volume water, %	C = total of coatings used, gal/unit
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Conditions D.1.8 and D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(a) and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
AIR COMPLIANCE BRANCH**

Part 70 Quarterly Report

Source Name: Therma Tru Corporation
Source Address: 108 Mutzfeld Road, Butler, Indiana 46721
Mailing Address: 108 Mutzfeld Road, Butler, Indiana 46721
Part 70 Permit No.: T033-7927-00019
Facility: Flowcoater (EU3)
Parameter: VOC delivered to the flowcoater
Limit: Less than 74.8 tons per twelve (12) consecutive month period

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is not required for this report